

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADJUSTACAM LLC
Plaintiff

v.

AMAZON.COM, INC. *et al.*,
Defendants

Case No. 6:10-cv-329-LED

JURY TRIAL DEMANDED

**DEFENDANT MICRO ELECTRONICS, INC.’S NOTICE OF JOINDER IN
DEFENDANT DELL INC.’S REPLY IN SUPPORT OF ITS MOTION TO DISMISS
PLAINTIFF’S ALLEGATIONS OF INDIRECT INFRINGEMENT AND WILLFUL
INFRINGEMENT FOR FAILURE TO STATE A CLAIM**

Defendant Micro Electronics, Inc. (“Micro Center”) hereby joins Defendant Dell Inc.’s Reply in Support of its Motion to Dismiss Plaintiff’s Allegations of Indirect Infringement and Willful Infringement for Failure to State a Claim (Docket No. 273) and the arguments and authorities found therein. Micro Center has previously joined Dell Inc.’s Corrected Motion to Dismiss Plaintiff’s Allegations of Indirect Infringement and Willful Infringement for Failure to State a Claim (Docket No. 198 (Micro Center’s Notice of Joinder); Docket No. 164 (Dell’s Motion to Dismiss)).

AdjustaCam LLC’s (“AdjustaCam”) allegations of indirect infringement against Micro Center are substantively the same as those it has asserted against Dell, Inc. (“Dell”), and are deficient for the same reasons set forth in Dell’s Reply. *Compare* First Amended Complaint for Patent Infringement (Docket No. 111), ¶ 144 (Micro Center) *with* ¶ 92 (Dell); *see also id.* at ¶ 224 (Micro Center & Dell). Because AdjustaCam has not adequately pled the required facts to support an allegation that Micro Center indirectly or willfully infringed the patent-in-suit, its indirect infringement and willful infringement claims against Micro Center should be dismissed.

DATED: October 6, 2010

By: /s/ Steven R. Daniels
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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel of record who have consented to electronic service as this district requires. Local Rule CV-5(a)(3)(A).

/s/ Steven R. Daniels